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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal
corporation,

Defendant.

Case No. 3:20-cv-00917-HZ

DECLARATION OF JOHN WILSON IN
SUPPORT OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION
ORAL ARGUMENT REQUESTED

I, John Wilson declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
 2. On August 24, 2020, I attended a protest in North Portland. It started at the Portland Police Association building on N Lombard St. I was protesting 2-3 times a week and was asked by a friend to accompany him for his first protest. I planned to keep an eye out for him and help him if needed. We met at the protest around 7:30 or 8:00pm.
 3. When we arrived, there was a line of protesters and a line of police. There were around 150-200 protesters and around 30-40 police. The police were surrounding the building and around 9:00 pm the police pulled back and were not in sight for a while.
 4. I noticed an awning on the Police building was on fire and the police came back and put the fire out and a stand-off started between the police and the protesters. My friend and I were not directly in the stand-off. We were standing in the 7-11 parking lot across Lombard with other protesters.
 5. We observed the protest and about 15-30 minutes later the police approached us and
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kettled us. The forced us to a narrow driveway behind Heavenly Donuts, just east of the 7-11.

6. As we were being pushed into the street, I saw another protester in the crowd get shoved to the ground by an officer and they proceeded to pepper spray the protester so long the can ran out of spray. The cop then threw the empty can at the person he had been spraying and hit them. I saw many people get arrested and beat by police. I saw smoke and smoke canisters everywhere.

7. My friend was yelling, and an officer grabbed him, I ran toward my friend and saw a different officer running toward me at full speed. I then felt a very powerful strike of a baton on my throat.

8. I was struck so hard by the officer that I was thrown against a parked car and then I fell on the ground. I was in pain and not resisting. A different officer came up to me and pepper sprayed me in the face. I was drenched in the spray. I have long hair and the pepper spray was all over my hair as well as my face.

9. A third officer grabbed me, pulled me up, then shoved me back down on the ground. As I got off the ground to walk down the street additional officers I passed would grab me and shove me down toward the end of the block.

10. Through the pain of the pepper spray and panic and confusion, I realized my fingertip was crooked and felt the pain in my left middle finger. I found a medic at the end of the block helping other protesters. I was so drenched in pepper spray the medic couldn't help me.

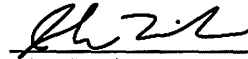
11. As I was walking back to my bike, I saw a friend of mine who is a nurse and had her treat my broken finger.

12. To the best of my knowledge, it was Portland Police Bureau who pepper sprayed, batoned, and shoved me because the officers responsible were wearing a uniform that looked like PPB.

13. I believe in the continued importance of the protests and would like to attend protests in the future. I worry that I will be injured again. I fear for my life and safety while protesting.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 10, 2022


John Wilson (Jan 10, 2022 22:16 PST)

JOHN WILSON